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 HITACHI, LTD., HITACHI DISPLAYS, LTD.
 (n/k/a JAPAN DISPLAY INC.), HITACHI
 AMERICA, LTD., HITACHI ASIA, LTD., AND
 HITACHI ELECTRONIC DEVICES (USA), INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

) Master File No. 3:07-cv-05944-SC

) MDL No. 1917

 This Document Relates To:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513

Best Buy Co., Inc., et al. v. Technicolor SA, et al., No. 13-cv-05264

Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, et al., No. 13-cv-05262

Sears, Roebuck and Co. and Kmart Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-01173

) **DECLARATION OF ELIOT A. ADELSON**
) **IN SUPPORT OF ADMINISTRATIVE**
) **MOTION TO FILE DOCUMENTS UNDER**
) **SEAL PURSUANT TO CIVIL LOCAL**
) **RULES 79-5(d) AND 7-11 RE**
) **DEFENDANTS' REPLY TO**
) **DEFENDANTS' MOTION IN LIMINE #5**
) **TO EXCLUDE PLEA BY SAMSUNG SDI**
) **COMPANY, LTD. AS TO NON-PLEADING**
) **DEFENDANTS OR ALTERNATIVELY TO**
) **PROVIDE A LIMITING INSTRUCTION**

) Judge: Hon. Samuel Conti
) Ctrm: 1, 17th Floor

ADELSON DECLARATION RE ADMIN. MOTION TO FILE
 DOCUMENTS UNDER SEAL RE DEFENDANTS' REPLY TO
 MOTION *IN LIMINE* #5 TO EXCLUDE SDI PLEA AS TO NON-
 PLEADING DEFENDANTS

3:07-cv-05944-SC
 MDL 1917

1)
2 *Sharp Electronics Corp., et al. v.*)
3 *Koninklijke Philips Electronics., N.V., et al.,*)
4 No. 13-cv-02776)
5)
6 *Siegel v. Hitachi, Ltd., et al.,* No. 11-cv-)
7 05502)
8)
9 *Siegel v. Technicolor SA, et al.,* No. 13-cv-)
10 05261)
11)
12 *Target Corp. v. Chunghwa Picture Tubes,*)
13 *Ltd., et al.,* No. 11-cv-05514)
14)
15 *Target Corp. v. Technicolor SA, et al.,* No.)
16 13-cv-05686)
17)
18 *ViewSonic Corporation v. Chunghwa*)
19 *Picture Tubes Ltd., et al.,* No. 14-cv-02510)

11
12 I, Eliot A. Adelson, declare as follows:

13 1. I am an attorney licensed to practice in the State of California and the Northern
14 District of California. I am a partner with the firm of Kirkland & Ellis LLP, and counsel for Hitachi,
15 Ltd., Hitachi Asia, Ltd., Hitachi America, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display Inc.), and
16 Hitachi Electronic Devices (USA), Inc. (collectively, the “Hitachi Defendants”). Except for those
17 matters stated on information and belief, about which I am informed and which I believe to be true, I
18 have personal knowledge of the facts stated herein and, if called as a witness, I could and would
19 competently testify thereto.

20 2. I submit this declaration in support of Defendants’ Administrative Motion to File
21 Under Seal Pursuant to Civil Local Rules 79-5(d) and 7-11 re Defendants’ Reply to Defendants’
22 Motion in Limine #5 to Exclude Plea by Samsung SDI Company, LTD. as to Non-Pleading
23 Defendants or Alternatively to Provide a Limiting Instruction (“Defendants’ Reply”). I make this
24 declaration pursuant to Civil Local Rule 79-5(d) to establish that certain portions of Defendants’
25 Reply contain Confidential and Highly Confidential information and are sealable.

26 3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter
27 (ECF No. 306, amended at ECF No. 1142) (the “Protective Order”).

4. On March 6, 2015, Defendants filed an Administrative Motion to Seal Defendants' Reply, and lodged conditionally under seal the following, pursuant to Civil Local Rules 7-11 and 79-5(d):

- a. Portions of the Defendants' Reply which contain, reference, or summarize confidential information contained in Direct Action Plaintiffs' Response in Opposition to Defendants' Motion in Limine No. 5 to Exclude Plea by Samsung SDI Company, LTD. as to Non-Pleading Defendants or Alternatively to Provide a Limiting Instruction ("Opposition to MIL 5"). Direct Action Plaintiffs have filed an administrative motion to file these portions of their Opposition under seal (ECF No 3643).

5. Pursuant to Civil Local Rule 79-5(d), I make this declaration on behalf of Defendants to provide the basis for the Court to maintain under seal certain documents and information designated by Defendants as "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order, and all references to those documents and information in Defendants' Reply.

6. I am informed and believe that the highlighted portions of Defendants' Reply quote, summarize, or describe portions of Direct Action Plaintiffs' Opposition to MIL 5 that summarize, quote from, describe, or contain information designated as "Confidential" or "Highly Confidential" by the Defendants pursuant to the Stipulated Protective Order. I am informed and believe that Defendants have taken reasonable steps to preserve the confidentiality of information of the type summarize, contained, identified, or cited to in Defendants' Reply.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: March 6, 2015

By: /s/ Eliot A. Adelson

Eliot A. Adelson